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DATE: JUNE 25, 1992
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SUBJECT: ENTERPRISE OIL, DETROIT, MI
POLREP NO.: ONE-FINAL SITE ID: PG D.O.: 7460-05-232
RESPONSE AUTHORITY: PRP NPL STATUS: NO
START DATE: 12/26/91
COMPLETION DATE: 02/28/92

1. SITUATION:

- A. IN JULY 1991, APPROXIMATELY 44,000 GALLONS OF WASTE OIL WAS RELEASED FROM THE ABANDONED ENTERPRISE OIL SITE, CURRENTLY OWNED BY MOTOR OILS REFINING COMPANY (MORECO) LOCATED IN DETROIT, MICHIGAN. WASTE OIL STORAGE OPERATIONS CEASED AT MORECO IN JANUARY 1988 AND MORECO FILED FOR BANKRUPTCY PROTECTION UNDER CHAPTER 11 ON JUNE 3, 1991. THE FACILITY ENCOMPASSES FOUR BUILDINGS AND TWO LARGE ABOVEGROUND TANK FARMS CONTAINING WASTE OIL: FOUR 250,000-GALLON TANKS AND TWELVE 20,000 - 30,000 GALLON TANKS AND ONE UNDERGROUND TANK FARM CONTAINING THIRTEEN 15,000 USTs. THERE WERE ALSO THREE 6,000-GALLON BULK TANK TRUCKS, FIVE 10,000-20,000-GALLON ABOVEGROUND STORAGE TANKS (ASTs), AND APPROXIMATELY FIFTY 55-GALLON DRUMS OF UNKNOWN MATERIAL.
- B. ON SEVERAL OCCASIONS, VANDALS ENTERED THE PROPERTY AND REMOVED THE BRASS VALVES CONNECTED TO THE 250,000-GALLON TANKS, RELEASING THEIR CONTENTS. A SIGNIFICANT QUANTITY OF WASTE OIL MIGRATED OFF-SITE UNDER THE CONTAINMENT WALL AND CONTAMINATED AN AREA OF APPROXIMATELY 400' BY 60' ALONG A RAILROAD LINE ADJACENT TO THE FACILITY.
- C. ON JULY 30, 1991, MDNR REQUESTED MORECO TO UNDERTAKE AND COMPLETE REMOVAL ACTIVITIES. ON AUGUST 21, 1991, THE CITY OF DETROIT DEPARTMENT OF COMMUNITY AND INDUSTRIAL HYGIENE REQUESTED IMMEDIATE SPILL RESPONSE ACTION AT THE MORECO SITE FROM THE U.S. EPA EMERGENCY AND ENFORCEMENT BRANCH, SECTION 1, GROSSE ILE, MICHIGAN. FROM SEPTEMBER 6-18, 1991, THE U.S. EPA TECHNICAL ASSISTANCE TEAM (TAT) CONDUCTED A SITE ASSESSMENT OF THE ENTERPRISE OIL PROPERTY TO DOCUMENT SITE CONDITIONS AND EVALUATE THREATS TO PUBLIC HEALTH AND THE ENVIRONMENT POSED BY THE PRESENCE OF UNCONTROLLED WASTE OIL AND HAZARDOUS SUBSTANCES.

2. ACTIONS TAKEN:

- A. MORECO COMMITTED TO CLEANUP ACTIVITIES IN SEPTEMBER 1991, AND STABILIZATION OF SITE WASTES COMMENCED ON OCTOBER 2, 1991. CLEANUP

OPERATIONS CEASED ON OCTOBER 25, 1991, UNTIL A WORKPLAN AND SITE HEALTH AND SAFETY PLAN WERE RECEIVED AND APPROVED BY THE U.S. EPA. CLEAN-UP ACTIVITIES RESUMED IN DECEMBER UPON ISSUANCE OF A UAO DATED 12/26/91, WHICH REQUIRED MORECO TO UNDERTAKE AND COMPLETE REMOVAL ACTIONS AT THE SITE. THESE ACTIVITIES INCLUDED: REMOVAL OF REMAINING WASTE OIL FROM ON-SITE STORAGE TANKS, INSTALLATION OF A TEMPORARY INTERCEPTION TRENCH TO COLLECT WASTE OIL MIGRATING FROM THE TANK FARM AREA, AND REPAIRS TO THE PERIMETER FENCE TO PROVIDE SECURITY. THERE WERE APPROXIMATELY 6,000 CUBIC YARDS OF CONTAMINATED SOIL EXCAVATED FROM AN AREA APPROXIMATELY 400 FEET BY 60 FEET ALONG AND UNDER THE RAILROAD LINE. ACTIVITIES WERE SUSPENDED ON FEBRUARY 28, 1992, WHEN MORECO REQUESTED A 60 DAY TIME EXTENSION TO THE UAO WHILE FEDERAL BANKRUPTCY PROCEEDINGS DETERMINED THE FATE OF THE COMPANY. MORECO HAS CONTINUED OPERATION AND MAINTENANCE OF THE INTERCEPTOR TRENCH SYSTEM, BUT HAS NOT COMMITTED TO COMPLETE ALL REMOVAL ACTIVITIES AS REQUESTED BY THE UAO.

- B. FROM OCTOBER 7, 1991, THROUGH FEBRUARY 14, 1992, MORECO TRANSPORTED OFF-SITE FOR TREATMENT AND DISPOSAL: SIX DRUMS OF ISOPROPANOL (FLAMMABILITY < 70* F), EIGHT DRUMS OF BOILER CHEMICALS, AND APPROXIMATELY 374,000-GALLONS OF MIXED WASTEWATER, DIESEL FUEL AND WASTE OIL. TAT PROVIDED OVERSIGHT OF ALL ACTIVITIES CONDUCTED UNDER THE UAO.
- C. IN THE EVENT THAT MORECO WAS UNABLE TO COMPLY WITH THE UAO, AN ACTION MEMORANDUM WAS SIGNED ON MARCH 19, 1992, TO EXPEND UP TO \$2.2 MILLION FOR A TIME-CRITICAL REMOVAL ACTION AT THE SITE. ON JUNE 8, 1992, MORECO WAS FOUND IN VIOLATION OF THE UAO.
- D. ON JUNE 15, 1992, A FEDERAL TAKEOVER ENSUED FOR THE MOBILIZATION OF A RESPONSE ACTION.

3. PLANS:

- A. U.S. EPA TO COMPLETE REMOVAL ACTIVITIES.

4. KEY ISSUES:

- A. REORGANIZATION OF MORECO'S ASSETS DURING BANKRUPTCY MAY NOT ALLOW MORECO TO CONTINUE COMPANY OPERATIONS.

5. STATUS:

- A. CASE OPEN.

- B. ESTIMATED COSTS: AS OF 03/28/92:

| | BUDGETED | TOTAL TO DATE | REMAINING |
|-----|--------------|---------------|-----------|
| TAT | \$ 21,000.00 | \$ 20,640.52 | \$ 359.48 |